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*Admitted to practice only in the District of
Columbia*

February 22, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

**Re: EB Docket No. 06-36
Section 64.2009(e) CPNI Certification
Southwest Texas Telephone Company (Form 499-A Filer ID No. 804444)**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 11-159, released January 28, 2011, attached for filing is a Section 64.2009(e) Customer Proprietary Network Information certification and accompanying statement covering the prior calendar year 2010 of Southwest Texas Telephone Company (Form 499-A Filer ID No. 804444).

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,



Thomas J. Moorman

Attachments

cc: Best Copy & Printing, Inc. (via email)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date filed: February 22, 2011

Name of Company: Southwest Texas Telephone Company

Form 499 Filer ID: 804444

Name of signatory: Gary C. Gilmer

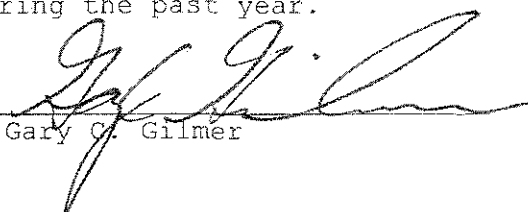
Title of signatory: Chief Executive Officer

I, Gary C. Gilmer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company does not have any information that pretexters have attempted to gain access to CPNI.

The company has not received any customer complaints in the past year concerning what it understands to be unauthorized release of CPNI. Nonetheless, the company did receive a complaint during 2010 concerning account information of a customer. That complaint was filed with and adjudicated by the Texas Public Utility Commission; and the circumstances concerning it are explained in the attachment. Further, there has been no unauthorized access, disclosure to unauthorized individuals or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

Signed: 

Gary C. Gilmer

Attachment: Accompanying Statement of CPNI Compliance and Procedures

SOUTHWEST TEXAS TELEPHONE COMPANY
STATEMENT OF COMPLIANCE and PROCEDURES
For Year Ending 2010
Form 499 Filer ID: 804444

1. This Statement of Compliance for Southwest Texas Telephone Company ("SWT" or "the Company") is attached to and referenced within the Company's 2010 Annual CPNI Certification.
2. SWT has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release or usage of CPNI.
3. The Company has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all company employees.
4. For year ending 2010, SWT is not aware of any incidents involving what it understands to be the access, breach, release or usage of its CPNI by any unauthorized person or entity; i.e., data broker and pretexter.
5. For year ending 2010, SWT has not received any customer complaints concerning what it understands to be the unauthorized access, breach, release or usage of CPNI. Nonetheless, out of an abundance of caution, SWT advises the Commission that during 2010 a SWT customer filed a complaint with the Texas Public Utility Commission ("Texas PUC") because SWT allowed a third party to pay a customer's telephone bill. The complaint was investigated and resolved by the Texas PUC, and the facts and circumstances relevant to the complaint are set forth in the attached documents (1) letter dated April 23, 2010 from Gary C. Gilmer, President of SWT, to Dana Atchison Drazen (2 pages); (2) letter dated April 23, 2010 from Gary C. Gilmer, President of SWT, to Mr. Harold Kohl, Consumer Protection Division, Texas PUC (1 page); and (3) Texas PUC On-Line Complaint Form dated April 12, 2010 (2 pages).



SOUTHWEST TEXAS TELEPHONE COMPANY
Founded 1898

SOUTHWEST TEXAS
TELEPHONE COMPANY

P.O. BOX 128
ROCKSPRINGS, TEXAS 78880
Telephone (830) 683-2111 FAX (830) 683-4190

April 23, 2010

Ms. Dana Atchison Drazan
P. O. Box 574
Rocksprings, TX 78880

Re: PUC Complaint No. CP2010040565

Dear Ms. Drazan:

We received a copy of your on-line complaint to the Public Utility Commission. I apologize for the fact that our Customer Service Representative, Mr. Ortiz, made a change to your account without first checking with you and getting your express permission. That violates our policy and he understands that he should not have done it. The change Mr. Ortiz made was to set up your account to be paid by draft automatically from the bank account of Mr. Joe Gentry, as requested by Mr. Gentry. It is no excuse, but Mr. Ortiz thought he was helping you by complying with Mr. Gentry's request.

I am very concerned about any allegation that one of our employees gave Mr. Gentry any information from your account. That would be a very serious violation of our policy and I will discipline any employee who violates that policy.

Here are the facts as I understand them. Your account was suspended on January 14, 2010, for nonpayment. On January 22, Mr. Gentry came to the Phone Store and told Mr. Ortiz he wanted to pay your phone bill and get your service reinstated. Mr. Gentry already knew that your phone service had been suspended, and he knew your telephone number. As you know, your telephone number was listed in the 2009 phone book (which was the current phone book at that time) under "Dixie's Drive-In", your former restaurant. Mr. Ortiz's best recollection is that Mr. Gentry also knew the amount you owed, \$94.26, but after this long he cannot say for certain.

Mr. Gentry then said he wanted us to draft his bank account in order to pay your phone bill until further notice in order to help you get back on your feet. Mr. Ortiz set up the draft, which as I stated above was a violation of our policy since he did not first verify with you that it was okay to make that change to your account.

After the draft was set up you received three telephone bills, one each month. A bill for your February service in the amount of \$54.65 was mailed to you on January 25, and was paid by draft from Mr. Gentry's bank account on February 15. A bill for your March service in the amount of \$45.67 was mailed to you on February 23, and was paid by draft from Mr. Gentry's bank account on March 15. A bill for your April service in the

Ms. Dana Atchison Drazan

April 23, 2010

Page 2

amount of \$45.76 was mailed to you on March 25, and you came to the Phone Store in person on March 30 and paid it yourself.

The first indication anyone here had that Mr. Gentry was acting without your authorization was when you came to the Phone Store on April 7. Both Mr. Ortiz and Mrs. Arredondo remember your visit, and when you left they were both unaware that you were unhappy with the way they had handled your account. Mrs. Arredondo is certain that she did not tell you that she had given Mr. Gentry any of your account information. In fact she did not deal with Mr. Gentry at all. Mr. Ortiz is the only one who dealt with Mr. Gentry and he specifically recalls that Mr. Gentry already knew your phone service was suspended and already knew your telephone number, and he believes that Mr. Gentry also knew the amount you owed at that time.

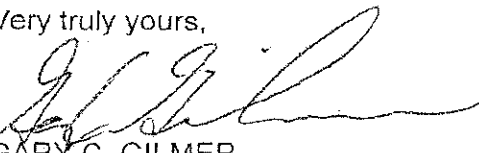
Both Mr. Ortiz and Mrs. Arredondo recall that you were complaining that Mr. Gentry had been interfering in your personal business and had been paying a number of your bills around town. They said you requested that we stop drafting his bank account and that we not accept any payments from anyone but you or your daughters for your account in the future. They were both under the impression that you were very unhappy with Mr. Gentry, but they did not realize that you were unhappy with us until we received the complaint from the Public Utility Commission.

I realize that there is a conflict between your recollection of the conversation of April 8, and the recollections of Mr. Ortiz and Mrs. Arredondo. All of this confusion would have been avoided had Mr. Ortiz contacted you when Mr. Gentry asked to initiate the draft. He understands that now.

We value your business and want you to have confidence that we are handling your account professionally. If you are uncomfortable dealing with our Phone Store employees you are welcome to come to our commercial office, which is only about a block from your house, to take care of any payments or other issues.

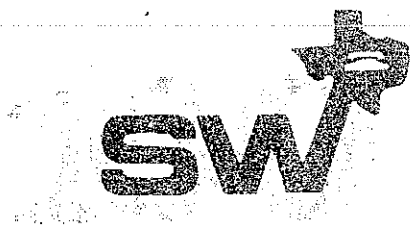
I am very sorry for the confusion and inconvenience you have suffered as a result of Mr. Gentry's actions and our failure to check with you. If you ever have a concern about anything related to our company in the future, I invite you to contact me directly at 683-2111 and I will do my best to resolve the problem.

Very truly yours,



GARY C. GILMER
President

XC: Mr. Harold Kohl
Public Utility Commission of Texas



SOUTHWEST TEXAS TELEPHONE COMPANY

Founded 1898

SOUTHWEST TEXAS
TELEPHONE COMPANY

P.O. BOX 128

ROCKSPRINGS, TEXAS 78880

Telephone (830) 683-2111 FAX (830) 683-4190

April 23, 2010

Mr. Harold Kohl
Consumer Protection Division
Public Utility Commission of Texas
P. O. Box 13326
Austin, TX 78711-3326

Re: Complaint No. CP2010040565,
Dana Atchison Drazan

Dear Mr. Kohl:


I have investigated the above-referenced complaint which was filed on-line with the Commission on April 9, 2010, and forwarded to us on April 12. I am enclosing a letter which I have sent to Ms. Drazan, explaining what I found in my investigation and apologizing for the inconvenience and confusion. I am also enclosing copies of the Counter Receipt and computer records showing activity on Ms. Drazan's account.

As your records will indicate, we have not had a consumer complaint of any kind in many years. We take Ms. Drazan's allegations very seriously and, in addition to sending her the enclosed letter, we have taken the following actions:

1. I have personally reviewed the entire matter with the CSR, Mr. Ortiz, and with his supervisor, and made it very clear that he should never make a change to a customer account without permission from an authorized person.
2. We have promulgated a written test that addresses a number of scenarios in which a CSR might be tempted to make an unauthorized change or disclose a customer's proprietary information. All CSRs have taken the test and the results indicate that there is no systemic problem.

Please let me know if you believe there is further action we should take with respect to Ms. Drazan's concerns.

Very truly yours,



GARY C. GILMER
President

Encl.

**CUSTOMER PROTECTION DIVISION
ON-LINE COMPLAINT FORM**

Complaint

Normal

Monday, April 12, 2010

Investigator: Kohl, Harold
Date Pending: 5/3/2010
Complaint No: CP2010040565
Company: SOUTHWEST TEXAS TELEPHONE COMPANY
Complaint: Customer Service
Service No: (830) 683-6220

Customer:
Last Name: Atchison Drazan
First Name: Dana
Business:
Date Closed:
Date Received: 4/9/2010
Account No: 99008568
Spanish: No

Service Address:

707 Highway 55 S

Rocksprings TX 78880

Alt Last:

Alt First:

Mail Address:

PO Box 574

Rocksprings TX 78880

Day: (830) 683-2128

Alt:

Email: love2cooksouthern@yahoo.com

Complaint Note:

[Local Telephone Provider: Southwest Texas Telephone Co] [Long Distance Provider: None] [Company Contact: Customer has contacted company.] On Wednesday April 7, I went into our local SW Texas office where I pay my bills. I spoke with Jude and Alicia.

On my April 2010 billing statement I asked why and what did Paid by Draft mean? As I always come to the office and pay and I had paid in March for March and not April? Did they mistaken credit me for April?

Alicia said "You know who paid!" I said "What?" She said "Joe Gentry"

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Entered By: ., Unknown

**CUSTOMER PROTECTION DIVISION
ON-LINE COMPLAINT FORM**

Complaint

Normal

Monday, April 12, 2010

I said "WHY!!!" She said "He came in and wanted to pay your bill."

I said, "I have never Authorized anyone other than myself and you allow a person, who I have NEVER had a relationship with; to walk in off the street and you set up automatic payment to my account from his bank account, without my permission?"

I said "I want yah'll to immediately stop this unauthorized payment from this unauthorized Joe Gentry person bank account to my phone account!"
Jude said "Yes, ma'am." Started typing at his computer....Alicia said "Stop!" to Jude. "We have to get Rachel's approval!" I looked at Alicia and asked "Rachel, who?" She said, "Rachel Gallegos." I said, "Why? I NEVER authorized this intrusion on my privacy." How could yah'll justify this?"

Alicia said, "Well, I thought it was a bit strange?! when he came in."

"Yah'll never contacted me or asked?" They both shook their head no! Than Alicia said "I had Joe sit right here by me and I filled out the application to have automatic withdrawal from his bank account to pay for your phone bill!" I said "Why?"

"You gave him my personal account information? including phone number?" She said "Yes."

" I have had TWO "No Trespass" criminal violations against Joe Gentry, he is now in custody for this crime! I have had phone traces because of this man's constant harrassing phone calls! He has now been taking into custody by the State of Texas for Mental problems!!!"

I a

Entered: 4/8/2010 1:53:00 PM

Entered By: ., Unknown